

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JASON CARR, VICKI LEMASTER,  
EDWARD FORD SERVICES LLC,  
CARLTON MORGAN, 365 SUN LLC,  
and CANDICE WORTHY, *individually  
and on behalf of others similarly  
situated*,

Plaintiffs,

v.

KABBAGE, INC., d/b/a K SERVICING,

Defendant.

CIVIL ACTION  
NO. 1:22-cv-01249-TWT

**CONSENT MOTION TO EXTEND DEFENDANT'S TIME TO RESPOND  
TO COMPLAINT**

Defendant Kabbage, Inc., d/b/a K Servicing (“K Servicing”) hereby files this Consent Motion seeking to extend K Servicing’s time to respond to Plaintiffs’ Jason Carr, Vickie LeMaster, Edward Ford Services LLC, Carlton Morgan, 365 Sun LLC, and Candice Worthy, *individually and on behalf of others similarly situated* (collectively “Plaintiffs”) Complaint. In support thereof, K Servicing states the following:

1. Plaintiffs commenced this action on March 30, 2022, through the filing of a Complaint.

2. On March 30, 2022, counsel for Plaintiffs also contacted counsel for K Servicing inquiring as to whether K Servicing will accept service.

3. On April 1, 2022, counsel for K Servicing agreed to accept service of the Complaint, and requested that Plaintiffs send a waiver of service for execution. In the meantime, the process server effectuated service on March 31, 2022.

4. This makes the current deadline for K Servicing to respond to the Complaint April 21, 2022.

5. Based on the foregoing, K Servicing respectfully requests that it be provided with sixty (60) days from March 31, 2022—the time it would have had to answer after waiver under Federal Rule of Civil Procedure 4(d)(3)—to answer, move or otherwise answer the Complaint.

6. Counsel for K Servicing has contacted counsel for Plaintiffs regarding this request, and Plaintiffs' counsel has agreed to an extension, through May 30, 2022, for K Servicing to answer, move or otherwise respond to the Complaint, without waiver of any applicable defenses.

For the foregoing reasons, K Servicing requests that this Motion be granted.

Respectfully submitted, this 12th day of April, 2022.

DENTONS US LLP

/s/ *Uchenna Ekuma-Nkama*

Uchenna Ekuma-Nkama  
Georgia Bar No. 957861  
303 Peachtree Street, N.E.  
Suite 5300  
Atlanta, GA 30308  
Telephone: (404) 527-4000  
Facsimile: (404) 527-4198  
uchenna.ekuma-nkama@dentons.com

Drew W. Marrocco  
(*pro hac vice* forthcoming)  
Virginia Bar No. 38955/D.C. Bar No. 53205  
1900 K Street NW  
Washington, DC 20006  
Telephone: (202) 496-7500  
Facsimile: (202) 496 7756  
drew.marrocco@dentons.com

*Counsel for Defendant*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

JASON CARR, VICKI LEMASTER,  
EDWARD FORD SERVICES LLC,  
CARLTON MORGAN, 365 SUN LLC,  
and CANDICE WORTHY, *individually*  
*and on behalf of others similarly*  
*situated,*

Plaintiffs,

v.

KABBAGE, INC., d/b/a K SERVICING,

Defendant.

CIVIL ACTION  
NO. 1:22-cv-01249-TWT

**CERTIFICATE OF SERVICE AND COMPLIANCE**

I certify that on April 11, 2022, I filed the foregoing **CONSENT MOTION TO EXTEND DEFENDANT K SERVICING'S, TIME TO RESPOND TO COMPLAINT** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record. I also certify that the foregoing was prepared in accordance with N.D. Ga. L.R. 5.1, using Times New Roman font, 14 point.

DENTONS US LLP

*/s/ Uchenna Ekuma- Nkama*  
Uchenna Ekuma-Nkama